

**UNITED STATES DISTRICT COURT  
DISTRICT OF PUERTO RICO**

**ANA R. OLIVELLA RIVERA**

Plaintiff

**Vs.**

**PR POPULAR LEASING AND  
RENTAL, INC. and OTHERS**

Defendants

**\* CASE NO.: 98-2267(JAG)**

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**\* CREDIT COLLECTION**

**\* DAMAGES**

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**MOTION REQUESTING ADDITIONAL TIME TO FILE DOCUMENT**

TO THE HONORABLE COURT:

COMES NOW Plaintiffs through the undersigned attorney and most respectfully alleges and prays:

1. Plaintiff hereby requests time to file a motion in reply to the *Motion In Limine* filed by Defendants on January 25, 2007, to which replies are to be filed before February 9, 2007.
2. Undersigned has been overwhelmed for the last two months by a backlog in his professional duties due to incontrollable causes.
3. On October 30, 2006, undersigned was hospitalized due to complications with his cardiac conditions. On November 4, 2006, he was sent home with indications of strict bed rest for three weeks. To this day, undersigned is still recuperating and adjusting his every day lifestyle to better suit his medical needs.

4. After returning to work, undersigned was pressured under a lot of stress, for all his work had been piling up. He had to work on three *certiorari* before the Court of Appeals for the Commonwealth of Puerto Rico; one extensive *Pre-Trial Memorandum* for the case of Viajes Galiana v. Gancedo; one extensive *Initial Scheduling Conference Memorandum* for the case of Rodriguez Paz v. Starwood Hotels & Resorts, Inc.; one extensive *Memorandum of Law* for the cases of Roberto Melendez v. Puerto Rico Ports Authority and Rigoberto Aviles v. Yaurel Security, Inc.; and depositions for the case of Loyda Torres v. Puerto Rico Water and Sewer Authority on Friday and Saturday, February 2 and 3, respectively.

5. On February 5<sup>th</sup>, 2007, we had a settlement conference before the Honorable Judge Salvador Casellas, which lasted from 2:00pm to 7:00pm. The case was settled, however, undersigned was extremely exhausted.

6. With all the extensive work scheduled that has been presented this past month, undersigned respectfully requests fifteen (15) additional days to correctly reply to the *Motion In Limine* filed by Defendants.

**RESPECTFULLY REQUESTED.**

I HEREBY CERTIFY that on this date, the foregoing motion was electronically filed with the clerk of the Court using the CM/ECF system which will send notification of such filing to corresponding parties.

In Caguas, Puerto Rico, at this February 6<sup>th</sup>, 2007.

**s/Rafael A. Oliveras López de Victoria**  
**Rafael A. Oliveras López De Victoria**  
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